

THE LAW OFFICE OF  
**JOSHUA MOSKOVITZ**

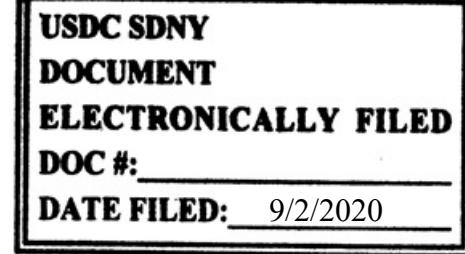
The Woolworth Building  
233 Broadway, Suite 2220  
New York, New York 10279

www.moskovitzlaw.com  
Tel. (212) 380-7040  
Fax (888) 398-0032

September 1, 2020

**BY ECF**

Hon. Stewart D. Aaron  
United States Magistrate Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007-1312



Re: *Sughrim et al. v. State of New York et al.*, No. 19-cv-07977 (RA) (SDA)

Your Honor:

I write as Plaintiffs' counsel, with Defendants' consent, pursuant to the Court's August 19, 2020 endorsement (Dkt. 183) of Plaintiffs' August 18, 2020 status report (Dkt. 182) concerning the parties' efforts to resolve the dispute of identifying putative class members. Since Plaintiffs' August 18 report, Defendants have produced documentation concerning the accommodation requests for twelve officers as requested by Plaintiffs pursuant to the Court's July 22, 2020 Order (Dkt. 169). The parties conferred by telephone earlier today regarding this production, including Plaintiffs' concerns about whether the production was complete. We agreed that Plaintiffs would provide Defendants with a letter by tomorrow outlining the documents that we expected to receive. We also discussed Plaintiffs' request for additional officer files. Defendants' counsel indicated they would consult with their clients about this request and the parties agreed to confer again, if possible, later this week.

In sum, the parties are continuing to engage in good-faith efforts that may resolve or limit the parties' dispute about identifying putative class members at this stage of the litigation. Accordingly, Plaintiffs propose to provide the Court with another status update on this issue no later than September 15, 2020.

Respectfully,

A handwritten signature in blue ink, appearing to read "Joshua S. Moskovitz".

Joshua S. Moskovitz

cc: All Counsel of Record (by ECF)

ENDORSEMENT: The Court adopts Plaintiffs' proposal. The parties shall file a joint status update no later than 9/15/2020. SO ORDERED.

Dated: 9/2/2020

A handwritten signature in blue ink, appearing to read "Stewart D. Aaron".